

Honorable Marsha J. Pechman

**UNITED STATES DISTRICT COURT,
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

HUONG HOANG, an individual,

Plaintiff,

vs.

AMAZON.COM, INC., a Delaware
corporation, and IMDB.COM, INC., a
Delaware corporation,

Defendants.

NO. 11-cv-01709-MJP

**DECLARATION OF HUONG
HOANG IN SUPPORT OF
PLAINTIFF'S MOTION TO SEAL**

I, Huong Hoang, do declare and attest as follows on the basis of my personal knowledge:

1. I am a party in the above lawsuit, am over the age of eighteen years of age, and competent to testify to the matters stated herein.

2. The documents listed in Ashley A. Locke's correspondence dated November 21, 2012 to my counsel include copies of my tax returns, passport, birth certificate, driver's license, novelty identification card, financial information, and trade secret documents. These documents all contain personally sensitive information about me, which is not publicly available.

3. I carefully guard my privacy and do not release financial information to the public. This includes how much I earn each year and how much I earn on acting projects.

4. I make every effort to keep my age and legal name private. This is motivated in

1 part by my concerns about identity theft and desire for privacy.

2 5. This lawsuit was brought because IMDb publicized my date of birth without my
3 consent; prior to this lawsuit, very few people knew my legal name or birthday.

4 6. I am an actor.

5 7. In order to land auditions and get cast in acting roles, I use various techniques as
6 part of my process. This includes the searches I run on casting websites, which websites I
7 accesses, and my connections within the industry. The methods I uses to secure auditions
8 and roles keeps me completeive in the acting industry. Disclosure of my methods would
9 undermine my ability to stay competitive in the industry.

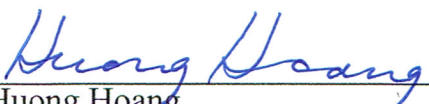
10 8. The following is a true and correct description of the documents at issue in the
11 Motion to Seal:

Description	Document Identifier
Ms. Hoang's Driver's License and Passport Cover Page	Bates No. Hoang 000065 (also Ex. 9 to Hoang Deposition, Volume 1, July 26, 2012)
Ms. Hoang's Birth Certificate	Bates No. Hoang 000064 (also Ex. 10 to Hoang Deposition, Volume 1, July 26, 2012)
Ms. Hoang's Birth Certificate	Bates No. IMDb 001051-1052 (2 pages), Ex. 19 to Hoang Deposition, Volume 1, July 26, 2012
Ms. Hoang's Texas Novelty Identification	Bates No. Hoang 000070 (also Ex. 31 to Hoang Deposition, Volume 1, July 26, 2012)
Ms. Hoang's Passport Cover Page	Bates No. Hoang 000071 (also Ex. 32 to Hoang Deposition, Volume 1, July 26, 2012)
Ms. Hoang's 2008 Tax Return	Bates No. Hoang 000031-39 (also Ex. 40 to Hoang Deposition, Volume 1, July 26, 2012)
Ms. Hoang's 2009 Tax Return	Bates No. Hoang 000040-44 (also Ex. 41 to Hoang Deposition, Volume 1, July 26, 2012)
Ms. Hoang's 2010 Tax Return	Bates No. Hoang 000045-55 (also Ex. 42 to Hoang Deposition, Volume 1, July 26, 2012)
Ms. Hoang's Tax 2011 Tax Return	Bates No. Hoang 000056-63 (also Ex. 43 to Hoang Deposition, Volume 1, July 26, 2012)
Plaintiff's Third Supplemental Objections and Responses to Defendants' Interrogatories and Requests for Production to Plaintiff—which contains	Also Ex. 1 to Hoang Deposition, Volume 1, July 26, 2012

Description	Document Identifier
discussion of Ms. Hoang's personal finances, including how much income she made in various years	
Chart of Ms. Hoang's acting income broken out by project and year	Bates No. Hoang 000021-23 (also Ex. 38 to Hoang Deposition, Volume 1, July 26, 2012)
Chart of Ms. Hoang's acting income broken out by project	Bates No. Hoang 000024-26 (also Ex. 39 to Hoang Deposition, Volume 1, July 26, 2012)
Chart of Ms. Hoang's acting income broken out by project and year	Bates No. Hoang 000167-169, (also Ex. 58 to Hoang Deposition, Volume 2, August 7, 2012)
Chart of Ms. Hoang's acting income broken out by project	Bates No. Hoang 000164-166, (also Ex. 59 to Hoang Deposition, Volume 2, August 7, 2012)
Ms. Hoang's Actors Access Archived Casting Schedule	Bates No. Hoang 000170-187
Plaintiffs Objections and Responses to Defendants' Second Set of Interrogatories and Requests for Production to Plaintiff, dated August 2, 2012—which contains discussion of Ms. Hoang's strategy for landing auditions and roles	Ex. 56 to Hoang Deposition, Volume 2, August 7, 2012
Ms. Hoang's Submission History on Actors Access	Bates No. Hoang 000200-202 (Ex. 47 to Hoang Deposition, Volume 2, August 7, 2012)
Ms. Hoang's "My Schedule" on Actors Access including notations	Bates No. Hoang 000170-185 (also Ex. 48 to Hoang Deposition, Volume 2, August 7, 2012)
Ms. Hoang's "Confirm Auditions" from her Casting Frontier Account	Bates No. Hoang 000186 (also Ex. 51 to Hoang Deposition, Volume 2, August 7, 2012)
Ms. Hoang's "Alert Archive" of auditions on LA Casting	Bates No. Hoang 000595-600 (also Ex. 53 to Hoang Deposition, Volume 2, August 7, 2012)
Ms. Hoang's casting submissions from Now Casting	Bates No. Hoang 000601-662 (also Ex. 54 to Hoang Deposition, Volume 2, August 7, 2012)
Ms. Hoang's audition history from Now Casting	Bates No. Hoang 000187 (also Ex. 55 to Hoang Deposition, Volume 2, August 7, 2012)
Ms. Hoang's submission history from Actors Access	Bates No. Hoang 000200-662

I certify and declare under the penalty of perjury under the laws of the United States that to my knowledge the foregoing is true and correct.

1 Executed this 29th day of November, 2012 at Los Angeles, California.

2
3 
4 Huong Hoang